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10
11 **UNITED STATES DISTRICT COURT**
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

13 DOT Operating Authority Inc., a
14 California Corporation,

15 Plaintiff,

16
17 v.

18 LAV Permit Inc., a California
19 Corporation; Valentina
20 Mkrtchyan, an individual; and
21 Rima Arakelyan, an individual,

22 Defendants.

Case No: 2:24-cv-3183 FMO (PDx)

**PLAINTIFF'S NOTICE OF INTENT
TO FILE FIRST AMENDED
COMPLAINT PER FED.R.CIV.P.
15(a)(1)(B)**

**Hon. Fernando M. Olguin
United States District Judge**

**TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF
RECORD:**

WHEREAS, Plaintiff DOT Operating Authority Inc. (“Plaintiff”) filed a complaint against Defendants LAV Permit Inc., Valentina Mkrtchyan, and Rima Arakelyan (“Defendants”) on April 18, 2024 (Dkt. 1);

WHEREAS, Defendants filed a motion to dismiss the complaint pursuant to Fed.R.Civ.P. 12(b)(6) on June 12, 2024 (Dkt. 20), which is set for hearing on July 11, 2024;

WHEREAS, Plaintiff’s opposition to Defendants’ motion to dismiss is due on June 20, 2024;

WHEREAS, Rule 15(a)(1)(B) of the Federal Rules of Civil Procedure provides in relevant part: “A party may amend its pleading once as a matter of course no later than... 21 days after service of a motion under Rule 12(b), (e), or (f), whichever is earlier”;

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THEREFORE, Plaintiff hereby gives notice that it intends to file a First Amended Complaint by July 3, 2024 in lieu of filing an opposition to Defendants' Rule 12(b)(6) motion to dismiss.

Respectfully submitted,

By:

Dated: June 20, 2024

/s/R. Joseph Trojan

R. Joseph Trojan

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